UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DOMENICA NOMINEES PTY. LTD.; FRANK WILSON; and LUCERNE AUSTRALIA PTY. LTD.,

Plaintiffs,

V.

EMERGING MARKETS INTRINSIC CAYMAN LTD.; SRT CAPITAL SEGREGATED PORTFOLIO COMPANY TFC; CGO V LLC; SRT CAPITAL SPC, LTD.; ERIC MAASS; and BULENT TOROS,

Defendants.

Case No. 1:16-cv-09016-VEC

RULE 7.1 DISCLOSURE STATEMENT OF PLAINTIFF LUCERNE AUSTRALIA PTY. LTD.

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, Plaintiff Lucerne Australia Pty. ("Lucerne") Ltd. by its attorneys, K&L Gates LLP, hereby discloses and certifies as follows:

Lucerne is wholly owned by Lucerne Group Pte Ltd.; and no publicly held corporation owns 10% or more of Lucerne's stock.

Dated: New York, New York December 7, 2016

Respectfully submitted,

K&L GATES LLP

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